

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DONALD J. TRUMP, DONALD J. TRUMP
JR., ERIC TRUMP, IVANKA TRUMP,

and

THE DONALD J. TRUMP REVOCABLE
TRUST, THE TRUMP ORGANIZATION,
INC., TRUMP ORGANIZATION LLC, DJT
HOLDINGS LLC, DJT HOLDINGS
MANAGING MEMBER LLC, TRUMP
ACQUISITION LLC, and TRUMP
ACQUISITION, CORP.,

Plaintiffs,

- against -

DEUTSCHE BANK AG and CAPITAL ONE
FINANCIAL CORP.,

Defendants.

Docket No. 1:19-cv-03826-ER

**NOTICE OF MOTION FOR A
PRELIMINARY INJUNCTION**

Per Federal Rule of Civil Procedure 65, Plaintiffs move for a preliminary injunction against Defendants Deutsche Bank AG and Capital One Financial Corp. and Intervenor-Defendants House Permanent Select Committee on Intelligence and House Financial Services Committee, prohibiting these parties from taking any steps to enforce or comply with the challenged subpoenas until this Court enters final judgment. Plaintiffs' motion is based on the attached memorandum of law, their declaration and other filings, and any oral argument or evidence presented at the preliminary-injunction hearing. Plaintiffs are entitled to a preliminary injunction because they have shown ““(a) irreparable harm and (b) either (1) likelihood of success on the merits or (2) sufficiently serious questions going to the merits to make them a fair ground for litigation and a balance of hardships tipping decidedly toward the party requesting the preliminary relief.”” *Citigroup Glob. Markets, Inc. v. VCG Special Opportunities Master Fund Ltd.*, 598 F.3d 30, 35 (2d Cir. 2010).

Dated: May 3, 2019

Marc L. Mukasey
Mukasey Frenchman & Sklaroff LLP
250 Park Avenue, 7th Floor
New York, NY 10177
347-527-3940
marc.mukasey@mukaseylaw.com

*Counsel for The Donald J. Trump Revocable Trust,
The Trump Organization, Inc., Trump Organization
LLC, The Trump Corporation, DJT Holdings LLC,
DJT Holdings Managing Member LLC, Trump
Acquisition LLC, and Trump Acquisition, Corp.*

Respectfully submitted,

s/ Patrick Strawbridge

Patrick Strawbridge
CONSOVOY MCCARTHY PARK PLLC
Ten Post Office Square
8th Floor South PMB #706
Boston, MA 02109
patrick@consovoymccarthy.com

William S. Consovoy
Cameron T. Norris
CONSOVOY MCCARTHY PARK PLLC
3033 Wilson Blvd., Ste. 700
Arlington, VA 22201
(703) 243-9423
will@consovoymccarthy.com
cam@consovoymccarthy.com

*Counsel for President Donald J. Trump,
Donald J. Trump Jr., Eric Trump, and Ivanka Trump*

CERTIFICATE OF SERVICE

I, Patrick Strawbridge, declare under penalty of perjury that I served a copy of this motion and all attached exhibits via email to counsel for Deutsche Bank and the House of Representatives. Counsel for Capital One will be served via ECF.

Dated: May 3, 2019

s/ Patrick Strawbridge